

COX COMMUNICATIONS, INC. 30(b)(6), Highly Confidential
SONY MUSIC ENT vs COX COMMUNICATIONS

April 25, 2019

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HIGHLY CONFIDENTIAL

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

SONY MUSIC ENTERTAINMENT, et al.)	
)	Case No.
Plaintiffs,)	1:18-cv-00950-
)	LO-JFA
)	
vs.)	
)	
COX COMMUNICATIONS, INC., et al.)	
)	
Defendants.)	
)	
- - - - -)	

30(b)(6) DEPOSITION OF
Cox Communications, Inc. and CoxCom, LLC
Through Its Corporate Representative
MATTHEW E. CAROTHERS

Thursday, April 25, 2019, 9:04 a.m.

Le Meridien Atlanta Perimeter
111 Perimeter Center West
Atlanta, Georgia 30346

WANDA L. ROBINSON, CRR, CCR, No. B-1973
Certified Shorthand Reporter/Notary Public

1 Response Program is to curb the behavior that led to
2 the complaints, and one obvious way to curb that
3 behavior is to ask them to remove the material.

4 Q And is this a fair statement of Cox's
5 policy on reactivation in July of 2013?

6 A Yes, I would say so.

7 Q You're familiar with CATS, are you not?

8 A I am.

9 Q What is -- first of all, what does CATS
10 stand for?

11 A CATS is the Cox Abuse Tracking System.

12 Q And what is the -- I'm going to use the
13 shorthand of CATS during the course of this
14 deposition. Does that make sense to you, as Cox's
15 Abuse Tracking System?

16 A Yes. I will assume you're not talking
17 about pets.

18 Q Excellent.
19 What does CATS do?

20 A Every ISP has a mailbox which is called
21 the abuse box, ours is abuse@cox.net, and the
22 purpose of the abuse box is to allow people, around
23 the world, to notify us when our subscribers are
24 doing things that violate our Acceptable Use Policy.
25 It could be copyright infringement, of course. It

1 could be the customer is infected with malware. It
2 could be they are sending spam. It could be threats
3 and harassment or stalking. Anything that someone,
4 somewhere in the world, thinks our customer is doing
5 that they shouldn't be.

6 So this mailbox receives thousands and
7 thousands of emails every day about all these
8 issues. Because there are so many emails, it's not
9 practical for people to just read them one by one
10 and manually investigate them. So CATS is the
11 system that takes the emails out of that inbox and
12 automates the process of investigating them.

13 Q CATS is a piece of software, at bottom, is
14 it not?

15 A It is.

16 Q And you created that software; is that
17 correct?

18 A I did.

19 Q When did you create CATS?

20 A Some time around 2001, 2002.

21 Q Did you create it entirely on your own?

22 A Mostly, yeah.

23 Q Who owns the rights in that software?

24 A I suppose Cox does.

25 Q Do you have a contract, an employment